

AO 91 (Rev. 5/85) Criminal Complaint

# United States District Court

DISTRICT OF MASSACHUSETTS

UNITED STATES of AMERICA v.

**Andres MARTINEZ** aka Castro Casimiro aka Joel Zequeira aka Sacaida; **Jose ROSALES** aka Tony aka Tono aka Joel Agostini; **Valentin MARTINEZ** aka Valentin Rivera aka V aka Vale; **Kelvin MADERA**, aka Manolo LNU aka Manuel Germosen; **Abdallah HAMDAN**; **CARLOS RUIZ**, aka Coco-Colo; **Ricardo MARTINEZ** aka Chorizo, aka Chori; **Howard GREENBERG** aka Howie; **Carlos COLON-RIVERA** aka Tigueron; **Rogelio GARCIA** aka Lacuilla, aka Alberto; **Javier Angel ROMERO** aka Ramon Acosta; **Christian CERMOSEN**, aka Christian; **Juan MARTINEZ** aka Marcelino Cuevas aka Chon; **Gerardo Vasseur ORTIZ** aka Scarface; **Phillip ASARO**, aka Phil; **Silvestre LIZARDI**, aka Silvestre; **Robert RUSCIO** aka Bob; **Giovanni AVILA** aka Giovanni aka the Painter; and **Gilberto ZAYAS**, aka Tony; **Luis DEJESUS**, aka Edgardo

## CRIMINAL COMPLAINT

CASE NUMBER:

04-1685-CBS

I, the undersigned complainant being duly sworn state the following is true and correct to the best of my knowledge and belief. On or about January 1, 2003 through the present in ESSEX county, in the

District of MASSACHUSETTS defendant(s) did, (Track Statutory Language of Offense)

knowingly and intentionally conspire with one another to possess with intent to distribute and to distribute quantities of cocaine, a Schedule II controlled substance,

in violation of Title 21 United States Code, Section(s) 846.

I further state that I am a(n) Special Agent of the DEA and that this complaint is based on the following facts:  
Official Title

See attached affidavit of Drug Enforcement Administration Special Agent Jean Drouin

Continued on the attached sheet and made a part hereof:

☒ Yes ☐ No

[Signature]  
Signature of Complainant

Sworn to before me and subscribed in my presence,

02-26-2004

Date

at

BOSTON, MASSACHUSETTS

City and State

**CHARLES B. SWARTWOOD, III**  
**UNITED STATES MAGISTRATE JUDGE**

Name & Title of Judicial Officer

[Signature]  
Signature of Judicial Officer